

Virginia Department of Environmental Quality

Electronic Waste (eWaste) Management Activities

**DEQ eWaste
Working Paper 04-04**

eWaste Management Recommendations

DEQ recommends that any locality, authority or other unit conducting collection and management programs for obsolete or discarded electronic products do so in accordance with EPA's Plug-In to e-Cycling Criteria for Material Management, Nov. 17, 2003. Among other things, the criteria recognizes the need for adequate markets for reuse and recycling, that the stated criteria should not be a barrier to such markets but that participants must exercise "due diligence" to ensure that no hazardous conditions are created by sponsored e-waste activities.

The Criteria are:

1. Processing electronic products must utilize reuse, refurbishment and recycling to the fullest extent possible and minimize disposal by landfilling or incineration. Organizations should determine preferred management techniques prior to beginning activities.
2. Wastes generated in any processing must be managed at a fully permitted facility, with written evidence.
3. Transportation, processing and management must comply with all federal and state requirements.
4. If products or components are exported, they must be done so in conformance with all requirements of the US and the transit and importing countries. If exported for recycling or disposal, the following must be removed before export: batteries, mercury or PCB-containing devices, and circuit boards.
5. Products and components for reuse and refurbishment must be pre-screened; if not, criteria 6 must be met. Sponsors should have business records on consignees and their product specifications. Once completed, the contractor must provide a description of shipment(s) contents and prices paid.
6. All recycling must be conducted with records of all downstream processing, recycling and disposal. All involved facilities must:
 - a. be fully permitted
 - b. have a certified Environmental Management System (EMS) or a written risk management plan
 - c. have sufficient occupational and environmental health and safety (EH&S) safeguards
 - d. have a monitoring and record-keeping program for compliance
 - e. financial assurance and closure plans consistent with permit requirements.

The full Criteria for Environmentally Sound Management (ESM) is attached.

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